



DLA Piper LLP (US)
The Marbury Building
6225 Smith Avenue
Baltimore, Maryland 21209-3600
www.dlapiper.com

Lauren Genvert Goetzl
lauren.goetzl@dlapiper.com
T 410.580.4178
F 410.580.3007

September 9, 2013
VIA E-MAIL FORRESTNYSDCHAMBERS@NYS.D.USCOURTS.GOV

The Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 730
New York, NY 10007-1581

**Re: In re: 650 Fifth Avenue and Related Properties
08 CV 10934 (KBF) and All Member and Related Cases**

Dear Judge Forrest:

Counsel for the Heiser Plaintiffs (the "Heisers") in the above-referenced case request that Your Honor allow us to arrange for the provision of secure high-speed wired Internet access in the courtroom. The Internet connection will enable the Heisers' counsel in the courtroom to stay connected to our online case repository and resources in the office during critical moments of the proceedings. This will greatly facilitate the Heisers' representation of their clients, as well as all of the Judgment Creditors. In addition, we will be able to reduce the files and personnel we bring into the courtroom, as well as the traffic to and from the courtroom during proceedings.

Subject to your approval, we will retain Courtroom Connect to provide these services, a vendor who has a contract with the Southern District of New York to be the exclusive provider of Internet access for attorneys. Courtroom Connect does not require any court resources to provide service, and has already installed the necessary network infrastructure in the court that is completely independent of the Court's existing systems. Courtroom Connect only needs the permission of the Court to temporarily activate connections inside the courtroom. This can be done easily, and, of course, will be paid for by the Heisers at no cost to the Court.

The following describes how Courtroom Connect restricts access to the network and ensures compliance with court security and directives:

- Onsite support, maintenance, monitoring, off-site user authentication, and many other measures are provided to ensure the highest levels of security and reliability.
- The network is completely separate from the court's internal network; it is therefore physically impossible for information on the court's existing systems to be accessed or compromised.

Courtroom Connect will make all necessary arrangements with the Court's District Executive office and computer networking personnel. Sumit Chatterjee (phone: 650-814-5776) from Courtroom Connect is available to answer any questions about service and can provide any additional information that you would like.



The Honorable Katherine B. Forrest
 September 9, 2013
 Page Two

Many trials in federal courts throughout the country have utilized a high speed connection to the Internet in the courtroom. Specifically, Courtroom Connect has provided services on a number of trials before the Southern District of New York. Below is a sample list of recent trials in SDNY where Internet access has been utilized.

1) <i>Terra Firma v CitiGroup</i>	Honorable Jed Rakoff	Oct 2010
2) <i>Tyco International v Walsh</i>	Honorable Denise Cote	Oct 2010
3) <i>United States v Cuti</i>	Honorable Deborah Batts	Apr 2010
4) <i>In Re: Vivendi Universal</i>	Honorable Richard Holwell	Oct 2009
5) <i>Infosint v Lundbeck</i>	Honorable Lewis Kaplan	Oct 2009
6) <i>City of NY v Exxon Mobil</i>	Honorable Shira Scheindlin	July 2009
7) <i>Aristocrat v Deutsche Bank</i>	Honorable Peter Leisure	Oct 2009
8) <i>United States v Coplan</i>	Honorable Sidney Stein	Mar 2009
9) <i>AIG v Bank of America</i>	Honorable John Koeltl	Oct 2008
10) <i>In RE: Pfizer Litigation</i>	Honorable Laura Swain	Oct 2009

The Heisers respectfully request that the Court permit the Heisers and Courtroom Connect to activate the wireless Internet in Your Honor's courtroom for the Heisers' use during the upcoming trial. Thank you for your consideration.

Respectfully yours,

DLA Piper LLP (US)

A handwritten signature in blue ink, appearing to read "Lauren G Goetzl".

Lauren Genvert Goetzl
 Associate

cc: All Counsel

EAST\58095348.1